

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

SHEILA BELL and JOSHUA BELL,

Plaintiffs,

Civil Action No.: 9:25-cv-4788-RMG

State Court C/A No.: 2025-CP-00159

v.

SANTHAN MANTHIRI and 9121-5848
QUEBEC INC, d/b/a ADVANCE FREIGHT
SERVICES,

**DEFENDANTS' ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES**

Defendants.

Pursuant to Rule 26.01 of the Local Civil Rules for the United States District Court, District of South Carolina, Defendants Santhan Manthiri and 9121-5848 Quebec Inc., d/b/a Advance Freight Services (hereinafter "Defendants" or "these Defendants"), by and through its undersigned attorneys, makes the following answers to Court ordered Interrogatories:

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: Not applicable to these Defendants.

(B) As to each claim state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiffs requested a jury trial on all claims contained in their Complaint. These Defendants request a jury trial on all claims as well.

(C) State whether the party submitting these responses is a publicly-owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: Not applicable to Defendant Santhan Manthiri. Defendant 9121-5848 Quebec Inc., d/b/a Advance Freight Services is a privately owned corporation.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). *See Local Civil Rule 3.01 (D.S.C).*

ANSWER: Plaintiffs' alleged injuries occurred in Hampton County, which is in the Beaufort Division.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Upon information and belief, no.

(F) [Defendants only.] If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: These Defendants are properly identified.

(G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

ANSWER: At this time, discovery and investigations are ongoing, and Defendants will supplement this response should responsive information be obtained.

(H) *Parties or Intervenor in a Diversity Case*. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER: Defendant 9121-5848 Quebec Inc., d/b/a Advance Freight Services is organized and existing under the laws of the Canada. Defendant Manthiri is a citizen and resident of Canada.

WILLSON JONES CARTER & BAXLEY, P.A.

s/ Dana Maurizio Klingener

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ATTORNEYS FOR DEFENDANTS

May 30, 2025

North Charleston, South Carolina